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Attorney for: Santander Consumer USA Inc.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:)	
)	Case No. 21-10976(MBK)
JESSE BISHOP)	
ANNIE R. BISHOP)	Chapter 13
)	Hearing Date: 3-24-21
)	
)	<u>OBJECTION TO CONFIRMATION</u>
)	

Santander Consumer USA Inc. ("Santander"), a secured creditor of the Debtor, objects to the Debtor's plan for the following reasons:

- a. **PLAN SILENT:** Santander holds a first purchase money security interest encumbering a 2012 CADILLAC CTS. The plan is silent as to Santander. The plan should be amended to state that Santander is unaffected by the plan, is being paid directly by the debtor outside the plan and will retain its lien on the vehicle after confirmation.
- b. **Proof of insurance:** The vehicle must be insured with comprehensive and collision insurance coverage and liability coverage in accordance with the requirements

contained in the contract. Santander must be listed as loss payee or additional insured. **The Debtor must provide Santander with proof that the vehicle is insured in accordance with §1326(a)(4) and this portion of the objection to confirmation should be considered a demand that the Debtors provide proof of insurance.**

c. Santander must retain its lien on the vehicle following confirmation, and until it is paid in full by the debtor in accordance with the terms of the retail installment contract encumbering the vehicle.

/s/ John R. Morton, Jr.

John R. Morton, Jr., attorney for
Santander Consumer USA Inc.

Date: 3-2-21